REMARKS

Claims 1-3, 6, 8-13, 15, 16, and 21-23 were pending and rejected. Claims 1 and 21 have been amended. No new matter has been added. Accordingly, after entry of the response Claims 1-3, 6, 8-13, 15, 16, and 21-23 will be pending. Reconsideration is respectfully requested based on the following remarks.

Claim Rejections 35 U.S.C. §102

Claims 1-3, 6, 11-13 and 21-23 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Application Publication No. 2001/0004253 to Fukutoku et al., herein referred to as "Fukutoku."

Of the above-referenced claims, Claims 1, 11 and 21 - 23 are independent. Accordingly, once allowability of these claims is established, all claims depending therefrom are likewise allowable.

Claims 1, 11 and 21 - 23 each recite, in part "wherein the signal controller comprises: a line counter for determining a row to which the block belongs; and a block counter for determining the position of the block in the row" (emphasis added).

In rejecting Claims 1, 11 and 21 - 23, the Office Action alleges that FIG. 11, #48 of Fukutoku, which is a "vertical pattern counting section" (Fukutoku, FIG. 11) corresponds to "a line counter for determining a row to which the block belongs" as recited in Claims 1, 11 and 21 - 23, and that FIG. 11, #44 of Fukutoku, which is a "horizontal pattern counting section" (Fukutoku, FIG. 11) corresponds to "a block counter for determining the position of the block in the row" as recited in Claims 1, 11 and 21 - 23 (Office Action, pages 3, 5, 6 and 8). Applicants respectfully disagree.

With respect to the "vertical pattern counting section 48," Fukutoku discloses:

> The vertical pattern counting section 48 counts the number of lines having different size relationships from those of the next line in the vertical direction, as shown in FIG. 17, based on the output of the vertical pattern comparing section 47 (step S18). When the number of lines having different size relationships from those of the next line in the vertical direction reaches a predetermined value, the output signal is set to be "H" (step S19). (Fukutoku, [0098]).

Counting "the number of lines having different size relationships" as disclosed in Fukutoku, is *not* "determining a row to which the block belongs" as recited in Claims 1, 11 and 21 - 23. Thus the "vertical pattern counting section 48" of Fukutoku does not correspond to the "a line counter for determining a row to which the block belongs" as recited in Claims 1, 11 and 21 - 23.

With respect to the "horizontal pattern counting section 44," Fukutoku discloses:

> The horizontal pattern counting section 44 counts the number of repetitions of the same pattern detected by the same pattern of a size relationship detecting section 43 (step S14). When the same pattern repeats at least a certain number of times, the horizontal pattern information storing section 45 stores the size relationship pattern in a shift register (step S15). In the example of FIG. 15, as the size relationship pattern, OR="L", OG="H", OB="H", ER="H", EG="L" and EB="L" are stored. For example, when OR and ER store "L" and "H", respectively, this indicates that the gradation difference between the R image data of the odd-numbered pixel and the R image data of the even-numbered pixel is equal to or more than a certain gradation difference and that the pattern repeats in one line (one horizontal synchronizing period) at least a certain number of times. (Fukutoku, [0096]).

Counting "the number of repetitions of the same pattern detected by the same pattern of a size relationship detection section 43" is *not* "determining the position of the block in the row" as recited in Claims 1, 11 and 21 - 23. Thus, the "horizontal pattern counting

section 44" of Fukutoku does not correspond to "a block counter for determining the position of the block in the row" as recited in Claims 1, 11 and 21 - 23.

Thus, Fukutoku does not disclose "wherein the signal controller comprises: a line counter for determining a row to which the block belongs; and a block counter for determining the position of the block in the row" as recited in Claims 1, 11 and 21 - 23.

For at least this reason, Applicants respectfully submit independent Claims 1, 11 and 21 - 23, and all claims depending therefrom are patentable.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejections under 35 U.S.C. §102(b).

Claim Rejections 35 U.S.C. §103

Claims 8, 9 and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Fukutoku in view of Clark (U.S. Patent No. 3,925,777), herein referred to as "Clark."

Claims 10 and 15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Fukutoku in view of Baron (U.S. Patent No. 3,740,743), herein referred to as "Baron."

The above-referenced claims are dependent from independent Claims 1 and 11. Accordingly, once allowability of Claims 1 and 11 is established, all claims depending therefrom are likewise allowable.

Claims 1 and 11 each recite, in part "wherein the signal controller comprises: a line counter for determining a row to which the block belongs; and a block counter for determining the position of the block in the row." As discussed above, Fukutoku does not disclose, nor does Fukutoku suggest "wherein the signal controller comprises: a line

counter for determining a row to which the block belongs; and a block counter for determining the position of the block in the row."

Clark and Baron do not correct the defects of Fukutoku.

For at least this reason, Applicants respectfully submit independent Claims 1 and 11, and all claims depending therefrom are patentable.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejections under 35 U.S.C. §103(a).

Conclusion

In view of the remarks set forth above, it is submitted that the application is now in condition for allowance. Authorization is given to charge any fees due or credit any overpayments in regard to this communication to deposit account 50-5029. If the Examiner has any questions or concerns, a telephone call to the undersigned at (408) 331-1674 is welcomed and encouraged.

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